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January 18, 2023

VIA ECF

Honorable Lorna G. Schofield
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *United States v. Robert Gonzalez* Dated: January 19, 2023
22-cr-207 (LGS) New York, New York

Dear Judge Schofield,

This letter is written to update the Court on Mr. Gonzalez's case and, with the government, jointly propose a discovery and motion schedule. I apologize for the untimeliness of this submission. Mr. Gonzalez's next conference is currently scheduled for February 21, 2023. Shortly after the new year, Mr. Gonzalez's Pretrial Services Officer, Shawn Bostic, requested that Mr. Gonzalez apply for the Young Adult Opportunity Program ("YAOP"). We have applied and expect to receive a decision by March 24, 2023. The government, through A.U.S.A. Mathew Andrews has informed defense counsel it does not oppose an adjournment until after the Mr. Gonzalez receive a decision regarding the YAOP.

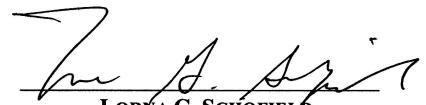
Therefore, with the consent of the government, Mr. Gonzalez respectfully requests an adjournment until a date and time after March 24, 2023. Defense consents to the exclusion of time pursuant to 18 U.S.C. § 3161(h)(7), in the interests of justice so that the Mr. Gonzalez may be informed of whether he is accepted to the YAOP and the parties may continue any other pretrial resolution discussions.

Respectfully submitted,


Meredith S. Heller

Cc: A.U.S.A. Mathew Andrews (via ECF)

Application Granted. The status conference currently scheduled for February 21, 2023, is adjourned to **March 28, 2023, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between today and March 28, 2023, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because Defendant has applied for the Court's YAOP program, which if accepted and completed, would resolve this matter. The exclusion would allow provide time for Defendant's application to be decided. For this reason, it is hereby ORDERED that the time between today and March 28, 2023, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 24.


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE